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June 14, 2022

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully requests permission to attend his grandson's middle school graduation on June 23, 2022 from 10:30 am to 6:30 pm (travel included) and a father's day celebration with his children and grandchildren from 10:00 am to 7:00 pm (travel included) on June 19, 2023. The government and Pretrial Services ("PTS"), have been provided the specific locations of these events. PTS by United States Pretrial Service Officer Andrew Abbott, does not consent to these requests, pursuant to PTS's policy not to consent to travel for social reasons as to any defendant on home detention. The government, by Assistant United States Attorney Jason Swergold, defers to PTS' position on this application.

Thank you for Your Honor's consideration of these requests.

MEMO ENDORSED

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Jason Swergold
AUSA Jun Xiang (by ECF)
AUSA Danielle Sassoon (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Andrew Abbott (by email)

6/14/2022

I have let enough of these requests. Mr. Cahill is on location monitoring with travel restrictions that are inconsistent with these repeated requests for modification. I have been generous - perhaps overly so - but from now on Mr. Cahill is expected to be in the same boat as anyone else.

What is a location monitoring with travel restrictions request denied

Colleen McMahon